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10  
11 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF WASHINGTON**  
12 **AT YAKIMA**

13 STATE OF WASHINGTON, et al.,

14 Plaintiffs,

15 v.

16 DONALD J. TRUMP, et al.,

17 Defendants.

NO. 20-03127-SAB

JOINT MOTION TO STAY ALL  
PENDING EVENTS AND  
DEADLINES FOR 30 DAYS

NOTING DATE: January 28, 2021  
Without Oral Argument

18 Plaintiffs and Defendants jointly and respectfully request that the Court  
19 stay all pending events and deadlines in this case, for a period of 30 days, to  
20 enable the parties to continue working toward a final resolution of the case. The  
21 parties propose to submit a joint status report to the Court at the end of the 30-  
22 day period if the case is not resolved by that time.

1           The Court “has broad discretion to stay proceedings as an incident to its  
 2 power to control its own docket.” *Clinton v. Jones*, 520 U.S. 681, 707-08 (1997)  
 3 (citing *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936)). When considering a  
 4 motion to stay, courts consider the following factors: (1) “the possible damage  
 5 which may result from the granting of a stay,” (2) “the hardship or inequity which  
 6 a party may suffer in being required to go forward,” and (3) “the orderly course  
 7 of justice measured in terms of the simplifying or complicating of issues, proof,  
 8 and questions of law which could be expected to result from a stay.” *Lockyer v.*  
 9 *Mirant Corp.*, 398 F.3d 1098, 1110 (9th Cir. 2005); (quoting *CMAX, Inc. v. Hall*,  
 10 300 F.2d 265, 268 (9th Cir. 1962)).

11           Here, the parties agree that all three factors weigh in favor of a stay of  
 12 limited duration. The parties believe they are close to a resolution, but obtaining  
 13 the necessary authority on behalf of the governmental entities that are parties to  
 14 this case has proved complex, requiring more time than anticipated. The parties  
 15 submit that a 30-day stay of pending events and deadlines will facilitate their  
 16 ongoing work toward a resolution, without damage or hardship to any party,  
 17 while conserving the resources of the parties and the Court.

18 DATED this 28th day of January, 2021.

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**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 28th day of January, 2021, at Tumwater, Washington.

/s/ Jennifer D. Williams

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